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Washington State Bar No. 23741

The Honorable Tana Lin

Attorney for Asset Recovery Group, Inc.

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SARAH PITERA,

Plaintiff,

vs.

ASSET RECOVERY GROUP, INC.,

Defendant.

Case No.: 2:22-cv-00255-TL

STIPULATED MOTION AND ~~PROPOSED~~  
ORDER TO CONTINUE TRIAL DATE AND  
AMEND CASE SCHEDULE

NOTE ON THE MOTION CALENDAR:  
August 11, 2023

**I. MOTION**

Plaintiff Sarah Pitera and Defendant Asset Recovery Group, Inc., by and through their respective counsel of record, hereby stipulate and jointly move to change the trial date and related deadlines pursuant to FRCP 6 and LCR10(g) as follows:

The parties' cross-motions for summary judgment have been pending since May 5, 2023. A decision on the motions will affect the issues remaining for trial, if any. While the parties and their counsel have been working diligently, more time is necessary for the Court to rule on the parties' cross-motions for summary judgment, and the parties to adequately consider the Court's ruling in their preparation for trial, if trial is necessary.

CERTIFICATE OF SERVICE - 1  
Case No. 2:22-cv-00255-TL

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The parties move for an extension to continue the trial date and other upcoming deadlines in this matter as follows:

Event	New Deadline	Old Deadline
Settlement Conference, if mediation has been requested by the parties per LCR 39.1, held no later than	2/6/2024	8/21/2023
Mediation per LCR 39.1, if requested by the parties, held no later than	3/6/2024	9/21/2023
All motions <i>in limine</i> must be filed by	4/1/2024	10/16/2023
Agreed LCR 16.1 Pretrial Order due	4/15/2024	10/30/2023
Trial briefs and preliminary proposed findings of fact and conclusions of law due by this date. Counsel are to confer and indicate with their submissions which exhibits are agreed to.	4/19/2024	11/6/2023
Pretrial Conference	4/26/2024	11/13/2023
<b>BENCH TRIAL DATE</b>	5/6/2024	11/20/2023

### I. STIPULATION

The parties, by and through undersigned counsel, hereby stipulate to the Motion.

Dated: August 11, 2023

ANDERSON SANTIAGO, PLLC

By: /s/ Jason D. Anderson  
 Jason D. Anderson, WSBA No. 38014  
 T. Tyler Santiago, WSBA No. 46004  
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*Attorney for Plaintiff*

Dated: August 11, 2023

HASSON LAW, LLC

By: /s/ Jeffrey I. Hasson  
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*Attorney for Defendant*

CERTIFICATE OF SERVICE - 2  
 Case No. 2:22-cv-00255-TL

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**II. ORDER**

IT IS SO ORDERED.

Dated this 11th day of August 2023.

A handwritten signature in black ink, appearing to read "Tana Lin", is positioned above a solid black horizontal line.

Tana Lin  
United States District Judge